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10 **IN THE UNITED STATES DISTRICT COURT**

11 **FOR THE DISTRICT OF NEVADA**

12 MICHELLE P. OBISPO,

13 Plaintiff,

14 v.

15 ASSET RECOVERY SOLUTIONS, LLC,
16 NATIONAL ENTERPRISE SYSTEMS, INC.,
17 EQUIFAX INFORMATION SERVICES, LLC,
18 TRANSUNION LLC, and EXPERIAN
19 INFORMATION SERVICES, INC.

20 Defendants.

21 Case No. 2:18-cv-01521-JAD-NJK

22 JOINT STIPULATION AND ORDER
23 EXTENDING DEADLINE FOR ASSET
24 RECOVERY SOLUTIONS, LLC TO FILE
25 AN ANSWER OR OTHERWISE RESPOND
26 TO PLAINTIFF'S COMPLAINT

27 **(FIRST REQUEST)**

28 Plaintiff MICHELLE P. OBISPO ("Plaintiff") and Defendant ASSET RECOVERY
29 SOLUTIONS, LLC ("Asset Recovery"), by and through their respective counsel, file this Joint
30 Stipulation Extending Deadline for Defendant Asset Recovery Solutions, LLC to File an Answer
31 or Otherwise Respond to Plaintiff's Complaint (ECF No. 1.).

32 On August 15, 2018, Plaintiff filed her Complaint. The claims at issue involve an account
33 owned by multiple parties, necessitating additional time for fact-finding. Further, Asset Recovery
34 is still in the process of acquiring and reviewing all relevant documents so that it can meaningfully
35 respond to the specific allegations contained in Plaintiff's Complaint. Moreover, undersigned
36 counsel was just retained by Asset Recovery to defend it in this action, and therefore requires
37 additional time to investigate the allegations and claims asserted against Asset Recovery.

38

1 Plaintiff has agreed to extend the deadline in which Asset Recovery has to answer or
2 otherwise respond to Plaintiff's Complaint up to and including October 23, 2018. This is the first
3 stipulation for extension of time for Asset Recovery to respond to Plaintiff's Complaint and is
4 being made in good faith and not for purposes of undue delay. No additional requests for
5 extensions are contemplated.

6 **IT IS SO STIPULATED.**

7 Dated this 3rd day of October 2018.

8 **HOLLEY, DRIGGS, WALCH, FINE,**
9 **WRAY, PUZEY & THOMPSON**

10 /s/ Michael R. Ayers

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14 800 S. Meadows Parkway, Suite 800
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16 *Attorneys for Defendant*
17 *Asset Recovery Solutions, LLC*

18 Dated this 3rd day of October 2018.

19 **COGBURN LAW OFFICES**

20 /s/ Erik Anthony W. Fox

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24 Henderson, NV 89074
25 *Attorneys for Plaintiff*

26 **ORDER**

27 The Joint Stipulation for Extending Deadline for Asset Recovery Solutions, LLC to file an
28 answer or otherwise respond up to and including October 23, 2018 is so ORDERED AND
29 ADJUDGED.

30 Dated this 4 day of October, 2018.

31 
32 HONORABLE NANCY J. KOPPE
33 UNITED STATES MAGISTRATE JUDGE